Federal Defenders OF NEW YORK, INC.

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December 8, 2020

MEMO ENDORSED

BY ECF

The Honorable Judge Lewis A. Kaplan United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

RE: <u>United States v. Richard Liriano</u> 19 Cr. 796 (LAK)

Dear Judge Kaplan,

The defense writes, with no objection from the government, to request a temporary modification of Mr. Liriano's bail. Mr. Liriano was released on bail on November 14, 2019, and he has remained in full compliance with all aspects of his pretrial release, including maintaining constant contact with his pre-trial officer and refraining from using electronic devices without monitoring software installed.

The defense respectfully requests Mr. Liriano be granted permission to travel to Miami Beach, Florida to spend Christmas and New Year's with his family. Mr. Liriano plans on departing from JFK airport and arriving in Miami Beach on Saturday, December 19, 2020 where he will reside with relative and cosigner, Patria Boyer, at 999 North East 167th Street, Unit 401. Finally, Mr. Liriano expects to return to New York City on January 2, 2021. The government has no objection to our request and pretrial takes no position.

This the second request for holiday travel, because Mr. Liriano was unfortunately not able to travel for Thanksgiving as initially planned.

On October 1, 2020, Your Honor imposed sentence on Mr. Lirano. He is to surrender to the designated facility before 2:00pm on January 14 2021 and is to serve a 30-month term of imprisonment, followed by a three-year term of supervised release. Mr. Liriano is fully prepared to surrender and on January 14, and hopes to spend a few more days with his elderly parents before then.

SO OPDERED

LEWIS A. KAPLAN, USP

12/9/2000